

REMARKS

Reconsideration and allowance of the above-subject application are respectfully requested.

Claims 49 and 50 in the amendment filed June 18, 2009 were mis-numbered and have been re-numbered claims 48 and 49, respectively.

Claims 27-32, 34, 36-41, and 43-49 stand rejected under 35 U.S.C. §103 as allegedly being obvious based on Boland (EP 1045604 A2) and newly-cited Chavez (US 6,192,234). This rejection is respectfully traversed.

In Boland, the service priority data associated with mobile subscribers 111 (mobile subscriber stations 101) is stored in a Home Location Register 113. The system in Boland compares the identity of a mobile subscriber station 101 with the service priority data stored in the HLR 113 for the mobile subscriber station 101 to determine whether this mobile subscriber station 101 is entitled to wireless service and specifically whether a subscriber has a priority that guarantees wireless service. The Examiner admits that Boland lacks multiple features relating to the claimed coverage area priority-tables having area IDs, priority levels, priority-groups, and quality of service associated with priority-level. The stored priority data in Boland is associated with mobile subscribers and/or mobile subscriber stations (a terminal) and not with a coverage area as is the case for the claimed priority-tables. Hence, the terminals/subscribers in Boland always have the same priority within the whole coverage area of the system. In contrast, the claimed user-device may have different service levels in different coverage areas as a result of the claimed priority-tables.

Each table in Figures 2-4 of Chavez is also associated with a user terminal. See Figs. 2-4 describing "TABLE 1 FOR WIRELESS TERMINAL 102", "TABLE 2 FOR WIRELESS

TERMINAL 103” and “TABLE 3 FOR WIRELESS TERMINAL 103”. In contrast, claim 27 recites “providing a number of priority-tables, each associated with one or several coverage areas of the system.” While there is some similarity between the Chavez tables and the claimed user-registers in the sense they are both linked to the user-device, the Chavez tables are quite different than the claimed number of priority-tables, each of which is associated with one or several coverage areas of the system. Since both Boland and Chavez only teach user-device tables rather than area tables, combining them fails to teach the coverage area priority tables.

In addition, Chavez routes incoming phone calls according to a “call coverage path.” See col. 1, lines 11-21 and col. 2, lines 11-13. The wireless terminals within a particular area are assigned to answer an incoming call in a particular order or sequence. This is accomplished by assigning a priority to each terminal such that a first terminal has a highest priority and will therefore attend to (i.e., “answer”) an incoming call first, whereas a second terminal has a lower priority and will therefore attend to the incoming call after a predetermined period if the first terminal has not yet attended to the call, and so on for a third terminal with an even lower priority. See the examples described in col. 3, line 50 to col. 4, line 19.

This simply means that the terminals in Chavez will attend to an incoming call in a predetermined order according to a “call coverage path.” But it does not mean that the terminals have been assigned any particular quality of service as recited in the independent claims. On the contrary, the terminals in Chavez have the same quality of service irrespective of its priority in the “call coverage path” and irrespective of its position in any particular area. As a result, Chavez does not provide different quality of service in different coverage areas as is the case in the claims.


Chavez requires that only one terminal is assigned a certain priority in a certain area. In other words, two terminals can not have the same priority in the same area. This is clear from the examples described in col. 3, line 50-col. 4, line 19 and from col. 4, line 61 to col. 5, line 5, which describes how to resolve a situation where two terminals have the same priority in the same area. Indeed, this follows from the general purpose of Chavez which is to route incoming phone calls according to a "call coverage path." If two terminals have the same priority in the same area, then both terminals would attend (i.e., "answer") an incoming call at the same time—and undesirable result in Chavez or in any other normal phone answering scheme. Thus, Chavez does not disclose or suggest a scheme where a plurality of user-devices can have the same priority in the same coverage area and thus be assigned the same quality of service as defined in the independent claims.

The application is in condition for allowance. An early notice to that effect is requested.

Respectfully submitted,

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